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July 17, 2018

BY ECF

Hon. Paul A. Crotty
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Johnny Hincapie v. The City of New York, et al.*, 18-CV-3432 (PAC)

Your Honor:

I am Senior Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to the defense of the above-referenced matter. Defendant City of New York respectfully requests an additional 60-day extension of time, from July 23, 2018 to September 21, 2018, to answer, move or otherwise respond to the complaint. Plaintiff's counsel has kindly consented to this request. This is defendant City's second request for such an extension.

Additionally, plaintiff requests a 60-day extension of plaintiff's 4(m) service deadline, which expires on July 19, 2018. Defense counsel consents to this request.

Due to the fact that plaintiff's arrest was in 1990, much of the relevant paperwork needed to assess the allegations in the complaint has been archived or is in storage. Thus, the additional time is needed to retrieve those documents so that defendant can properly evaluate the complaint and respond accordingly.¹

¹ Defendant notes that none of the individually named defendants have been served in this lawsuit. Although the instant application is not made on their behalf, should they be served on or before August 31, 2018 (21 days before September 21, 2018), defendant hopes that in the interest

In light of the above, defendant City respectfully requests that the Court grant defendant City a 60-day extension of time, from July 23, 2018 to September 21, 2018, to answer, move or otherwise respond to the complaint. Additionally, plaintiff requests a 60-day extension of plaintiff's 4(m) service deadline, which expires on July 19, 2018.

Defendant City thanks the Court for its time and consideration of the within request.

Respectfully submitted,

/s/

Matthew E. Stein
Senior Counsel

MES/m

cc: All Counsel (by ECF)

of judicial economy, the Court may, *sua sponte*, also extend their time to respond to the complaint to September 21, 2018.